

Filed Under Seal

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. <u>17-</u>
v.	:	DATE FILED: _____
LAWRENCE JAMIESON	:	VIOLATIONS:
JOHN BROWN	:	18 U.S.C. § 2422(b) (enticement of a
	:	Minor to Engage in Sexually Illicit
	:	Conduct – 2 counts)
	:	18 U.S.C. § 2251(a) (manufacturing child
	:	pornography – 18 counts)
	:	18 U.S.C. § 1470 (transfer of obscene
	:	material to a minor – 1 count)
	:	18 U.S.C. § 2252(a)(2) (distribution of
	:	child pornography - 8 counts)
	:	18 U.S.C. § 2252(a)(2) (receipt of child
	:	pornography - 10 counts)
	:	18 U.S.C. § 2252(a)(4) (possession of child
	:	pornography – 2 counts)
	:	Notice of forfeiture

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

In or about February, 2015 through on or about August 3, 2016, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

LAWRENCE JAMIESON,

knowingly used a facility and means of interstate and foreign commerce, that is, the Internet and cell phone, to persuade, induce, entice and coerce Minor #1, who had not attained the age of 18 years, to engage in sexual activity, for which any person could be charged with a criminal offense, and did attempt to do so, and did aid and abet, that is, JAMIESON attempted to coerce

Minor #1 to engage in sexual activity and record that sexual activity, in violation of 18 U.S.C.

§ 2251(a).

In violation of Title 18, United States Code, Section 2422(b).

COUNTS TWO THROUGH SIXTEEN**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, each date constituting a separate count of this Indictment, in the Eastern District of Pennsylvania, and elsewhere the defendant,

LAWRENCE JAMIESON

employed, used, persuaded, induced, enticed, and coerced, and attempted to, and aided and abetted, the employment, use, persuasion, inducement, enticement, and coercion of Minor #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and defendant JAMIESON knew and had reason to know that the visual depiction was produced or would be transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, and the visual depiction was actually transmitted in interstate or foreign commerce:

Count	Date of Offense
Two	November 10, 2015
Three	November 12, 2015
Four	November 16, 2015
Five	November 18, 2015
Six	November 19, 2015
Seven	November 23, 2015
Eight	November 30, 2015
Nine	December 18, 2015
Ten	June 17, 2015
Eleven	March 12, 2016
Twelve	April 12, 2016
Thirteen	May 20, 2016
Fourteen	July 10, 2016
Fifteen	July 15, 2016
Sixteen	July 17, 2016

All in violation of Title 18, United States Code, Sections 2251(a), and 2251(e).

COUNTS SEVENTEEN THROUGH TWENTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates listed below, each date constituting a separate count of this Indictment, in the Eastern District of Pennsylvania, and elsewhere the defendant,

LAWRENCE JAMIESON,

knowingly received visual depictions that had been shipped using a means and facility of interstate and foreign commerce, which visual depictions showed a minor under the age of 18 years engaged in sexually explicit conduct, and the producing of those visual depictions involved the use of minors under the age of 18 years engaged in sexually explicit conduct.

Count	Date of Offense
Seventeen	May 17, 2015
Eighteen	March 12, 2016
Nineteen	April 12, 2016
Twenty	May 20, 2016
Twenty-One	July 10, 2016
Twenty-Two	July 17, 2016

In violation of Title 18, United States Code, Section 2252(a)(2).

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES THAT:

In or about February, 2015 through on or about August 3, 2016, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

JOHN BROWN,

knowingly used a facility and means of interstate and foreign commerce, that is, the Internet and cell phone, to persuade, induce, entice and coerce Minor #1, who had not attained the age of 18 years, to engage in sexual activity, for which any person could be charged with a criminal offense, and did attempt to do so, and did aid and abet, that is, JAMIESON attempted to coerce Minor #1 to engage in sexual activity and record that sexual activity, in violation of 18 U.S.C. § 2251(a).

In violation of Title 18, United States Code, Section 2422(b).

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about March 6, 2015, in the Eastern District of Pennsylvania, and elsewhere, defendant

JOHN BROWN,

using a means or facility of interstate commerce, knowingly transferred an obscene matter to Minor #1, whom BROWN believed had not attained the age of 16 years, and who in fact was under the age of 16 years.

In violation of Title 18, United States Code, Section 1470.

COUNTS TWENTY-FIVE THROUGH TWENTY-EIGHT

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates listed below, each date constituting a separate count of this Indictment, in the Eastern District of Pennsylvania, and elsewhere the defendant,

JOHN BROWN,

knowingly received visual depictions that had been shipped using a means and facility of interstate and foreign commerce, which visual depictions showed a minor under the age of 18 years engaged in sexually explicit conduct, and the producing of those visual depictions involved the use of minors under the age of 18 years engaged in sexually explicit conduct.

Count	Date
Twenty-Five	March 6, 2015
Twenty-Six	March 10, 2015
Twenty-Seven	March 26, 2015
Twenty-Eight	March 30, 2015

In violation of Title 18, United States Code, Section 2252(a)(2).

COUNTS TWENTY-NINE THROUGH THIRTY-SIX**THE GRAND JURY FURTHER CHARGES THAT:**

On or about the dates listed below, each date constituting a separate count of this Indictment, in the Eastern District of Pennsylvania, and elsewhere the defendant,

JOHN BROWN

knowingly distributed visual depictions that had been shipped using a means and facility of interstate and foreign commerce, which visual depictions showed a minor under the age of 18 years engaged in sexually explicit conduct, and the producing of those visual depictions involved the use of minors under the age of 18 years engaged in sexually explicit conduct.

Count	Date
Twenty-Nine	March 6, 2015
Thirty	May 21, 2016
Thirty-One	May 25, 2016
Thirty-Two	July 12, 2016
Thirty-Three	May 21, 2016
Thirty –Four	May 25, 2016
Thirty-Five	July 11, 2016
Thirty-Six	July 12, 2016

In violation of Title 18, United States Code, Section 2252(a)(2).

COUNTS THIRTY-SEVEN THROUGH FORTY

THE GRAND JURY FURTHER CHARGES THAT:

On or about the dates listed below, each date constituting a separate count of this Indictment, in the Eastern District of Pennsylvania, and elsewhere the defendant,

JOHN BROWN

employed, used, persuaded, induced, enticed, and coerced, and attempted to, and aided and abetted, the employment, use, persuasion, inducement, enticement, and coercion of Minor #1 to engage in sexually explicit conduct for the purpose of producing a visual depiction of that conduct, and defendant BROWN knew and had reason to know that the visual depiction was produced or would be transmitted using materials that have been mailed, shipped, or transported in or affecting interstate or foreign commerce by any means, and the visual depiction was actually transmitted in interstate or foreign commerce:

Count	Date of Offense
Thirty-Seven	May 17, 2015
Thirty-Eight	May 6, 2016
Thirty-Nine	June 4, 2015
Forty	September 19, 2013

All in violation of Title 18, United States Code, Sections 2251(a), and 2251(e).

COUNT FORTY-ONE

THE GRAND JURORS FURTHER CHARGE THAT:

On or about August 3, 2015, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

LAWRENCE JAMIESON

knowingly possessed books, magazines, periodicals, films, video tapes and other matter, namely a laptop computer, external storage devices, and cellular telephones, which contained visual depictions that had been produced using materials which had been shipped and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

COUNT FORTY-TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about August 3, 2015, in the Eastern District of Pennsylvania, and elsewhere, the defendant,

JOHN BROWN

knowingly possessed books, magazines, periodicals, films, video tapes and other matter, namely cellular telephones, and email accounts, which contained visual depictions that had been produced using materials which had been shipped and transported in interstate and foreign commerce. The production of these visual depictions involved the use of minors engaging in sexually explicit conduct and the visual depictions were of minors engaging in sexually explicit conduct.

In violation of Title 18, United States Code, Section 2252(a)(4)(B).

NOTICE OF FORFEITURE

THE GRAND JURY FURTHER CHARGES THAT:

As a result of the violations of Title 18, United States Code, Sections 2422(b), 2251(a), 2252(a)(2) and 2252(a)(4)(B), as set forth in this indictment, defendants

**LAWRENCE JAMIESON and
JOHN BROWN**

shall forfeit to the United States of America:

(a) any visual depiction described in section 2252, or any film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received as a result of such violation;

(b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such violation;

(c) any property, real or personal, used or intended to be used to commit or to promote the commission of such violation; and

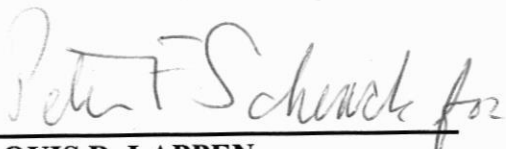
(d) any property used or intended to be used, in any manner or part, to commit, or to facilitate the commission of, the violations of Title 18, United States Code, Sections 2422(b), 2251(a), 2252(a)(2) and 2252(a)(4)(B), including, but not limited to:

- i. Thumb drives, CDs, and DVDs, taken from LAWRENCE JAMIESON on the date of the search warrant;
- ii. Toshiba Satellite laptop, with no identifiable serial number, taken from LAWRENCE JAMIESON on the date of the search warrant;
- iii. Samsung Galazy Note 6S cellular telephone, electronic serial number 990005880006045;
- iv. LG Flip cellular telephone, model GPLG440GB, serial number 412CYEA523428;
- v. Pure Digital F260G flip video recorder, serial number GS2080406931
- vi. Samsung Galaxy Note 5, SM-N920T, serial number RF8H2026RXE; and
- viii. HTC cellular telephone (IMEI 358209040244597).

All pursuant to Title 18, United States Code, Section 2253.

A TRUE BILL:

GRAND JURY FOREPERSON



LOUIS D. LAPPEN
Acting United States Attorney